

May 30, 2023

The Honorable Alan Davidson
Assistant Secretary for Communications and Information
National Telecommunications and Information Administration
Department of Commerce
1401 Constitution Ave NW
Washington, DC 20230

RE: Development of a National Spectrum Strategy, Docket No.230308–0068/(NTIA-2023-0003)

Dear Assistant Secretary Davidson,

United Spinal Association appreciates the opportunity to contribute to the National Telecommunications and Information Administration’s (NTIA’s) request for comments regarding the development of a National Spectrum Strategy.

United Spinal Association, founded by paralyzed veterans in 1946, is dedicated to enhancing the quality of life of all people living with spinal cord injuries and disorders (SCI/D), paralysis, neurological conditions and other mobility disabilities, including veterans, and providing support and information to loved ones, care providers and professionals. United Spinal represents 5.5 million wheelchair users across the country, has over 61,000 members, 47 chapters, 120 support groups and more than 100 rehabilitation facilities and hospital partners nationwide. Additionally, we work collaboratively with Spinal Cord Injury Model (SCI) System Centers and the Model Systems Knowledge Translation Center that provide innovative research and support in the field of SCI. United Spinal Association is also a VA-accredited veterans service organization (VSO).

Pillar #2 –Long-Term Spectrum Planning

According to a recent study by the Pew Research Center, “when it comes to smartphone ownership, there is a gap of 16 percentage points between those with a disability and those without one (72% vs. 88%).”¹ The same study found that “Roughly a quarter of Americans with disabilities (26%) say they have high-speed internet at home, a smartphone, a desktop or laptop computer and a tablet, compared with 44% of those who report not having a disability.”

Further, in addition to a geographic digital divide that negatively impacts rural residents more than most urban residents, digital divides exist between people with disabilities and the general population in terms of employment, accessibility, usability and affordability.

The world of people with disabilities could, indeed must, become more connected to the Internet. Increased Internet connectivity will improve the health, safety, transportation, education, employment and independence of people with disabilities. As you are acutely aware, the provision of broadband to every household is a necessary goal in achieving the maximum benefit the Internet can offer. It is a goal United Spinal embraces in order to include people with disabilities and bring more equitable opportunities to them. Creating a plan to

¹ See: <https://www.pewresearch.org/short-reads/2021/09/10/americans-with-disabilities-less-likely-than-those-without-to-own-some-digital-devices/>

address the digital divides of people with disabilities must be a priority of every federal resource, certainly NTIA's role must increase. Thus, a long range National Spectrum Strategy focused on diversity, inclusion, equity and accessibility is essential.

United Spinal further recommends including in the Plan your vision of "the short, medium, and long-term needs of both commercial and federal users."² Industry dependent upon licensed spectrum must be able to depend on the amount of spectrum inventory available at dates certain before it can be expected to fully serve the needs and aspirations of our community and the nation.

United Spinal, and other disability organizations, as key stakeholders in the digital universe must participate fully in NTIA's and the FCC's spectrum and digital world planning processes.

Pillar #3 – Unprecedented Spectrum Access and Management through Technology Development

United Spinal has long advocated for a sustained federal investment ensuring the deployment and maintenance of a high capacity, secure and reliable latest generation broadband national network that is accessible and adoptable for all Americans. To make broadband affordable to all, we endorse a permanent financial support system for households based on the criteria used with the Federal Communications Commission's (FCC's) Affordable Connectivity Program.

Even though the disability community may have a limited perspective of the trends in industries utilizing spectrum, we assure you that we wholeheartedly agree with your assessment and forecast that "we saw Americans' demand for wireless-based services increase over the past decade, and it spiked during the COVID-19 pandemic. The demand for this scarce resource will continue to grow. Next-generation Wi-Fi networks, new satellite mega-constellations, 6G networks, connected cars and private wireless networks will add to the need for more spectrum resources."³

Please know that United Spinal does not want our country to retreat one hertz from the height of the connectivity our communities enjoyed during the COVID Pandemic. In fact, United Spinal continues to avidly advocate for, as you suggest, the expected expansion of connectivity through spectrum use in the coming years and decades.

From autonomous vehicles and the connected cars you mentioned, to smart cities, smart homes and smart wheelchairs as well as our national infrastructure, people with disabilities and especially wheelchair users will gain significantly more independence. The more our daily lives are connected through emerging technologies, like telehealth, remote work, personal health diagnostics and monitoring, and through a proliferation of helpful smart phone applications, the healthier our community, and the community as a whole, becomes and the more our lives will be enriched.

But our community's needs demand a more balanced spectrum allocation, providing industry the type of spectrum essential to our health and safety and paramount to our hopes and aspirations. It is the type of spectrum upon which we rely, literally every minute of every day. It must be the most non-congested, top performing, peak efficient, soundly secure spectrum possible. For these reasons, we strongly recommend that

² See: <https://ntia.gov/speechtestimony/2023/remarks-alan-davidson>

³ Ibid.

the National Spectrum Plan, at its heart, must provide sufficient licensed spectrum to unleash the potential of the commercial sector that depends on this premium spectrum. In short, licensed spectrum will also unleash our community's potential.

Thank you for considering these comments. Please do not hesitate to contact Kent Keyser, Public Policy Fellow, with any questions at kkeyser@unitedspinal.org.

Sincerely,

Alexandra Bennewith

Alexandra Bennewith, MPA
Vice President of Government Relations